

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

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|---------------------------|---|-----------------|
| UNITED STATES OF AMERICA, | : | |
| | : | |
| Petitioner, | : | |
| | : | |
| v. | : | No. CA-05-141-E |
| | : | |
| CATHERINE Y. PEI, | : | |
| a/k/a CATHERINE BYNUM, | : | |
| | : | |
| Respondent. | : | |
| | : | |

ORDER ENFORCING INTERNAL REVENUE SUMMONS

AND NOW, this ____ day of _____ 2005, the Court finding that:

(1) the summons issued by Shannon Dickerson, a Revenue Agent of the Internal Revenue Service, to respondent Catherine Y. Pei ("Pei"), on February 20, 2004, was issued for the legitimate purpose of determining the taxpayer's correct federal income tax liabilities with respect to the taxable years ending 1999 and 2000; (2) that the summoned testimony and the documents identified on the summons and at the hearing held on July 27, 2005 may be relevant to that determination; (3) the information sought is not already in the possession of the Internal Revenue Service, except for those few documents identified in Agent Dickerson's declaration and at the hearing on July 27, 2005; and (4) the administrative procedural steps required by the Internal Revenue Code have been followed; it is therefore

ORDERED, ADJUDGED AND DECREED that, on August 31, 2005 at 10:00 a.m., respondent Pei shall appear before Revenue Agent Shannon Dickerson or any other

authorized officer of the Internal Revenue Service, at the Internal Revenue Service office located at 1314 Griswald Plaza, Erie, Pennsylvania, 16501, and then and there be sworn, to give testimony and produce for examination and copying the items demanded in the summons relating to any foreign credit card or bank account and which have not been identified as already in the possession of the Internal Revenue Service. The examination is ordered to continue from day-to-day until completed.

The respondent may, on a question-by-question or document-by-document basis, invoke her fifth amendment privilege against self-incrimination. To the extent that the petitioner disputes these claims of privilege, the Court shall review the substance of such privilege claims as necessary, at a later date and time to be determined by the Court.

UNITED STATES DISTRICT JUDGE